



American Association of  
State Highway and  
Transportation Officials

Wm. G. Burnett, P.E., President  
Executive Director  
Texas Department  
of Transportation

Francis B. Francois  
Executive Director

January 4, 1996

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JAN 16 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 239  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Sir or Madam:

Enclosed are an original and nine copies of AASHTO's reply comments on PR Docket 92-235 concerning Replacement of Part 90 by Part II to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them and Examination of Exclusivity and Frequency Assignment Policies of the Private Land Mobile Radio Services.

Do not hesitate to so inform me should you have further comments or questions regarding this submittal.

Yours truly,

A handwritten signature in dark ink, appearing to read "Francis B. Francois", with a stylized flourish at the end.

Francois B. Francois  
Executive Director

FBF:LAM

encl.

cc: Alan Hull  
Chester Jones  
Jack Stanton

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JAN 16 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )

Replacement of Part 90 by Part 88 )  
to Revise the Private Land Mobile )  
Radio Services and Modify the )  
Policies Governing Them )  
and )  
Examination of Exclusivity and )  
Frequency Assignment Policies of )  
the Private Land Mobile Radio )  
Services )

DOCKET FILE COPY ORIGINAL

Reply Comments of the  
American Association of State Highway and Transportation Officials

Special Committee on Communications

Alan Hull, Chairman

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**PR Docket No. 92-235**

**REPORT AND ORDER AND  
FURTHER NOTICE OF PROPOSED RULE MAKING**

**To: The Commission**

## **REPLY COMMENTS**

The American Association of State Highway and Transportation Officials (AASHTO) respectfully submits these reply comments in the Commission's Report and Order and Further Notice of Proposed Rule Making in the above captioned proceeding.

AASHTO is the national association of the state departments of highways and transportation in the 50 states, the District of Columbia and Puerto Rico. Its scope includes all five principal transportation modes, and its major purpose is to foster the development, operation and maintenance of an integrated national transportation system.

AASHTO, through its Special Committee on Communications, has been involved in matters related to radio frequency communications and associated systems for more than 40 years. AASHTO serves as the Commission's certified frequency coordinator for the Highway Maintenance Radio Service. AASHTO is an active member of the Intelligent Transportation Society of America (ITSA) with membership of many ITSA committees including the ITSA Telecommunications Committee.

## **POSITION STATEMENT**

With the release of Report and Order and Further Notice of Proposed Rule Making PR Docket No. PR 92-235, the Commission provided frequency coordinators three months to negotiate and submit a consensus consolidation proposal to the Commission.

It is the position of AASHTO, as noted in the comments filed in this very proceeding, that the current system of representative frequency coordinators has served, and continues to serve, both the radio system operator and the Commission, well.

AASHTO also recognizes that the Commission is committed to some form of radio service consolidation. AASHTO, along with most of the certified frequency coordinators, participated in meetings sponsored by the Land Mobile Communications Council as well as the Personal Communications Industry Association. The participants were unable to agree on a single consolidation plan.

There were four consolidation proposals filed by smaller groups of frequency coordinators. The AASHTO Special Committee on Communications conducted an in depth review of the proposals and feels that if the current services are consolidated, then the plan consisting of four pools, namely, Public Safety, Business, Industrial/Utilities, and Land Transportation, would offer the most benefit to existing and future radio system users.

The advantages of this approach include, the grouping of like users, historical sharing of frequencies, and reduction in the complexities of scale by making the number of frequencies in each pool manageable.

The current public safety radio service frequency coordinators have utilized the prevailing rules for the interservice sharing of public safety frequencies to effectively reduce both real and perceived spectrum usage imbalances. This procedure has also increased the level of interoperability between the various public safety agencies who often respond to the same incident. In many states the highway, police, emergency medical, fire, and natural resources agencies share a common frequency (channel) for coordination of efforts when needed. One example of such an operation is a highway accident involving a tanker which is carrying a hazardous and flammable material. All the aforementioned public safety agencies would respond to this type of incident. Coordination of activities and communications between the respondents is essential in mitigating the loss of life and property. The Commission should consider this and include all the current public safety services in the consolidated "public safety" pool.

In any case, the Commission should provide an adequate transition period between the issuance of final rules defining the new consolidated pools and the effective date of those rules. This time will be needed in order for the frequency coordinators to develop standard operating procedures and to develop technical standards by which recommendations will be made. A period of six months would be sufficient.

## CONCLUSION

The current system of representative frequency coordinators has accomplished and continues to accomplish the goal of assisting the Commission in making the most appropriate choices in frequency assignments and should be retained.

AASHTO respectfully requests that if the Commission proceeds to consolidate the existing radio services, it consider and act favorably upon the aforementioned recommendations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'F B Francois', followed by a horizontal line.

Francis B. Francois, Executive Director  
American Association of State  
Highway and Transportation Officials